

Utah Insurance Department  
State Office Building, Rm 3110  
Salt Lake City, UT 84114  
Suzette D Green-Wright, Market Conduct Director  
Telephone: (801) 538-9674  
Email: sgreenwright@utah.gov

<b>UTAH INSURANCE DEPARTMENT</b>	:	<b>NOTICE OF INFORMAL</b>
<b>COMPLAINANT,</b>	:	<b>AGENCY ACTION</b>
	:	<b>AND ORDER</b>
	:	
<b>RESPONDENT,</b>	:	
<b>GUARANTEE TRUST LIFE INS COMPANY</b>	:	Docket No. 2017-013 HL
Attn: Theresa Tyc, Vice President:	:	
1275 Milwaukee Avenue	:	E-Case No. 3861
Glenview, IL 60025	:	Lisa Watts Baskin
Email: ttyc@gtlic.com	:	Administrative Law Judge
NAIC Co-Code: 64211	:	
	:	

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The Utah Insurance Department has commenced this informal adjudicative proceeding pursuant to Utah Code Ann. §§ 31A-2-201, 31A-3-103 and 63G-4-201 and Utah Admin. Code R590-160. Based upon information contained in the Department's files or known to the Department, the presiding officer enters the following:

### **FINDINGS OF FACT**

1. Respondent, Guarantee Trust Life Insurance Company (GTL), is a licensed insurance company authorized to do the business of insurance in the State of Utah holding License No. 384, NAIC Co-Code No. 64211.

2. In October 2015, the Department reviewed the website [www.quotemymed.com](http://www.quotemymed.com) in connection with an investigation unrelated to Respondent. During the review of this website, the Department obtained a copy of an application for membership into the association Wholesale Benefits Association (WBA). The application listed GTL as the insurer.

3. A review of Department records indicated that there was no Utah Accident and Health Insurance Group Questionnaire on file for WBA.

4. Respondent provided a response to the Department's inquiry on January 15, 2016, informing the Department that GTL was no longer offering insurance coverage through the association WBA. However, based on the Respondent's response, GTL had issued insurance coverage through other associations that were never filed with the Department.

5. On July 15, 2016, additional information disclosed that GTL was continuing to allow insurance coverage through the following associations: 1) AmeriBenefit Plan; 2) Healthcare Cost Containment United Association; 3) National Health Access; 4) Unified Caring Association; and 5) United Service Association.

6. On January 10, 2017, GTL disclosed that its decision to discontinue offering insurance coverage in Utah through associations was due to the rejection of two association questionnaire filings.

7. At the time of the previous administrative action in 2012, GTL failed to disclose that it had additional associations that were issuing policies on Utah citizens. The 2012 forfeiture was for non-filing of the required Utah Accident and Health Group Questionnaire.

8. GTL continued to offer non-qualified coverage for existing members until such time that either the member lapsed or the association terminated coverage.

Having entered the Findings of Fact, the Presiding Officer now enters the following:

#### **CONCLUSION OF LAW**

1. Respondent violated R590-220-9(2) by failing to file the Utah Accident and Health Insurance Group Questionnaires for the five associations referenced above.

Based on the Findings of Fact and the Conclusion of Law, the Administrative Law Judge now enters the following Order:

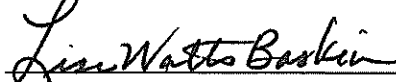
**ORDER**

**IT IS HEREBY ORDERED:**

1. Respondent, GTL, is assessed an administrative forfeiture in the amount of \$12,500.00 which shall be paid to the Department no later than ten (10) days after the date this Order becomes final.
2. Respondent, GTL, shall provide a 90-day notice to all enrollees in the association(s) list of enrollees that states: "Guarantee Trust Life Insurance Company will cease insuring Utah residents under all association policies which have not been approved in Utah." The 90-day notice shall be sent to the Utah Insurance Department for review no later than five (5) days after the date this Order becomes final. The notice shall be sent within ten (10) days after receipt by the Department with its suggested changes.
3. This Order shall become final fifteen (15) days after the date of mailing unless a written request for a hearing is received from the Respondent in the offices of the Department prior to that date. A written request for a hearing shall be signed by the person making the request and shall state the basis for the relief requested.

DATED this 12<sup>th</sup> day of May, 2017.

TODD E. KISER  
INSURANCE COMMISSIONER



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Lisa Watts Baskin  
Administrative Law Judge  
Utah Insurance Department  
State Office Building, Room 3110  
Salt Lake City, UT 84114  
Telephone: (801) 538-3800

### **NOTIFICATION**

If you request a hearing regarding this matter, please contact Market Conduct Director, Suzette D. Green-Wright at (801) 538-9674. Failure to request a hearing will be considered a failure to exhaust administrative remedies and will preclude any further administrative or judicial review or appeal of this matter.

You are further notified that a failure to obey an order of the Commissioner may subject you to further penalties, including forfeitures of up to \$2,500.00 per violation and the suspension or revocation of your license and the filing of an action to enforce this Order in district court, which may impose forfeitures of up to \$10,000.00 per day for continued violation.

You are further notified that other jurisdictions in which you may be licensed may require that you report this action to them.

**CERTIFICATE OF MAILING**

I do hereby certify that on this date I both electronically transmitted and sent by regular mail a true and correct copy of the attached NOTICE OF INFORMAL AGENCY ACTION AND ORDER to the following:

GUARANTEE TRUST LIFE INSURANCE COMPANY

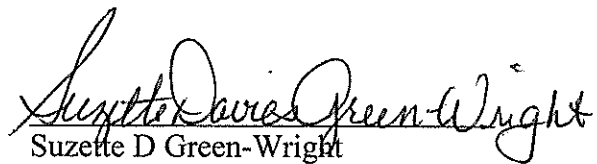
ATTN: THERESA TYC, VICE PRESIDENT

1275 MILWAUKEE AVENUE

GLENVIEW IL 60025

ttyc@gtlic.com

Date: 5/12/2017

A handwritten signature in black ink, reading "Suzette D Green-Wright". The signature is written in a cursive style with a large, looping initial 'S'.

Suzette D Green-Wright

Utah Insurance Department

State Office Building, Room 3110

Salt Lake City, UT 84114

Telephone: 801 538-3800